

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
NEWARK DIVISION**

In re:	) CASE NO. 16-18469-VFP
	) JUDGE Vincent F. Papalia
	)
Norbey M Pareja,	)
	)
Debtor.	)
	)
	)
	)
	)

**NATIONSTAR MORTGAGE LLC d/b/a MR. COOPER'S NOTICE OF  
DEBTOR'S REQUEST FOR FORBEARANCE DUE TO THE COVID-19 PANDEMIC**

Now comes Creditor, Nationstar Mortgage LLC d/b/a Mr. Cooper ("Creditor"), by and through undersigned counsel, and hereby submits this Notice to the Court of the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of six (6) months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting 04/01/2020 through 09/01/2020. Creditor holds a secured interest in the real property commonly known as 2109 Peer Place, Denville Township, New Jersey 07834, as evidenced by Claim Number 10 on the Court's claim register. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance period or make arrangements to care for the forbearance period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Per the request, Debtor will resume Mortgage payments beginning 10/01/2020 and will be required to cure the delinquency created by the forbearance period (hereinafter “forbearance arrears”). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves its rights to seek relief from the automatic stay upon expiration of the forbearance period.

DATED: May 7th 2020

**RAS Citron, LLC**

Authorized Agent for Secured Creditor

130 Clinton Road, Suite 202

Fairfield, NJ 07004

Telephone: (973) 575-0707

By: /s/ Shauna Deluca

Shauna Deluca, Esquire

Bar ID: SD-8248

Email: sdeluca@rasflaw.com

**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing *Notice of Debtor's Request for Forbearance* was served upon the following parties in the following fashion on this 7th day of May 2020.:

Norbey M Pareja  
2109 Peer Place  
Denville, NJ 07834

And via electronic mail to:

Scott E. Tanne  
Scott E. Tanne Esq.  
4 Chatham Road  
Summit, NJ 07901

Marie-Ann Greenberg  
Chapter 13 Standing Trustee  
30 Two Bridges Rd  
Suite 330  
Fairfield, NJ 07004

**RAS Citron, LLC**  
Authorized Agent for Secured Creditor  
130 Clinton Road, Suite 202  
Fairfield, NJ 07004  
Telephone: (973) 575-0707  
By: /s/ Shauna Deluca  
Shauna Deluca, Esquire  
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